

NOTICE OF OBJECTION TO CONFIRMATION

WELLS FARGO BANK, N.A. has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

ALBERT RUSSO, Trustee
CN 4853, SUITE 101
TRENTON, NJ 08650

2. Attend the hearing scheduled to be held on 01/02/2019 in the TRENTON Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: December 14, 2018

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 42689

Fax: 856-813-5501

Email: nicholas.rogers@phelanhallinan.com

File No. 818772

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard
Philadelphia, PA 19103
856-813-5500
FAX Number 856-813-5501
WELLS FARGO BANK, N.A.

In Re:
MAUREEN GILLIGO

Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

Chapter 13

Case No. 18-31826 - CMG

Hearing Date: 01/02/2019

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, WELLS FARGO BANK, N.A., the holder of a Mortgage on Debtor's residence located at 3101 NOTTINGHAM WAY, MERCERVILLE, NJ 08619-1844 hereby objects to the Confirmation of the Debtor's proposed Chapter 13 Plan on the following grounds:

1. Secured Creditor is WELLS FARGO BANK, N.A..
2. Debtors, MAUREEN GILLIGO, JOSEPHINE A. GILLIGO are the owners of the property located at 3101 NOTTINGHAM WAY, MERCERVILLE, NJ 08619-1844.
3. Secured Creditor is in the process of drafting and filing a Proof of Claim. The approximate arrears are \$11,358.26.
4. Debtor's Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtor's Plan currently provides for payment to Secured Creditor in the amount of \$0.
6. Secured Creditor objects to Debtor's Plan as it is underfunded. Debtors' Plan should be amended to fully fund the arrears owed to Secured Creditor. Absent a modification by the Debtor, confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that the Confirmation of Debtor's Plan be denied.

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 42689
Fax: 856-813-5501
Email: nicholas.rogers@phelanhallinan.com

Dated: December 14, 2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

818772
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for WELLS FARGO BANK, N.A.

In Re:

Maureen Gilligo

Case No: 18-31826 - CMG

Hearing Date: 01/02/2019

Judge: CHRISTINE M.
GRAVELLE

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Bjorn Pilgrim:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC,
who represents WELLS FARGO BANK, N.A. in the above captioned matter.

☐ am the _____ in the above case and am representing
myself.

2. On December 14, 2018 I sent a copy of the following pleadings and/or
documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent
using the mode of service indicated.

Dated: December 14, 2018

/s/ Bjorn Pilgrim
Bjorn Pilgrim

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
MAUREEN GILLIGO 3101 NOTTINGHAM WAY, MERCERVILLE, NJ 08619-1844	DEBTOR	<input type="checkbox"/> HAND-DELIVERED <input checked="" type="checkbox"/> REGULAR MAIL <input type="checkbox"/> CERTIFIED MAIL/RR <input type="checkbox"/> E-MAIL <input type="checkbox"/> NOTICE OF ELECTRONIC FILING (NEF) <input type="checkbox"/> OTHER _____ (AS AUTHORIZED BY THE COURT *)
BRIAN W HOFMEISTER, ESQUIRE 3131 PRINCETON PIKE BLDG. 5, SUITE 110 LAWRENCEVILLE, NJ 08648	DEBTORS ATTORNEY	<input type="checkbox"/> HAND-DELIVERED <input checked="" type="checkbox"/> REGULAR MAIL <input type="checkbox"/> CERTIFIED MAIL/RR <input type="checkbox"/> E-MAIL <input type="checkbox"/> NOTICE OF ELECTRONIC FILING (NEF) <input type="checkbox"/> OTHER _____ (AS AUTHORIZED BY THE COURT *)
ALBERT RUSSO, TRUSTEE CN 4853 SUITE 101 TRENTON, NJ 08650	TRUSTEE	<input type="checkbox"/> HAND-DELIVERED <input checked="" type="checkbox"/> REGULAR MAIL <input type="checkbox"/> CERTIFIED MAIL/RR <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> NOTICE OF ELECTRONIC FILING (NEF) <input type="checkbox"/> OTHER _____ (AS AUTHORIZED BY THE COURT *)
U.S. TRUSTEE U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100 NEWARK, NJ 07102	TRUSTEE	<input type="checkbox"/> HAND-DELIVERED <input type="checkbox"/> REGULAR MAIL <input type="checkbox"/> CERTIFIED MAIL/RR <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> NOTICE OF ELECTRONIC FILING (NEF)

		<input type="checkbox"/> OTHER _____ (AS AUTHORIZED BY THE COURT *)
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* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.